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Public Service Commission

December 13, 1996

BY AIRBORNE EXPRESS

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

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FCC MAIL ROOM

Re: CC Docket No. 96-45 - Federal-State Joint Board on Universal Service.

Dear Mr. Caton:

Enclosed are the original and twelve copies of the Florida Public Service Commission's comments in the above docket. Please date-stamp one copy and return it in the enclosed self-addressed stamped envelope. We are also forwarding a hard copy, plus diskette, of our comments to Sheryl Todd of the Common Carrier Bureau.

We are also sending one copy of the comments to International Transcription Service.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cynthia B. Miller".

Cynthia B. Miller
Associate General Counsel

CBM/jb
Enclosure

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BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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In the Matter of:)
)
Federal-State Joint Board on) CC Docket No. 96-45
Universal Service)
)

COMMENTS OF THE

FLORIDA PUBLIC SERVICE COMMISSION

On November 7, 1996, the Federal-State Joint Board adopted a Recommended Decision on Universal Service, as required by Section 254 of the Telecommunications Act of 1996. On November 18, 1996, the Federal Communications Commission (FCC) issued a request for comment on that Recommendation. While many recommendations were made on universal service issues, some areas remain open. The FCC has requested comment on certain of the unresolved matters.

The Florida Public Service Commission (FPSC) is pleased to provide comments on these issues of major importance. Our comments are limited to the topic of Support for Low-Income Consumers.

Support for Low-Income Consumers

With regard to Low-Income Consumers, the FCC asks whether the \$5.25 baseline amount suggested in the Joint Board's Recommended Decision is likely to be adequate. Additionally, the FCC seeks comment on how it can avoid what it perceives as the unintended consequence that the increased federal support amount will have no direct effect on Lifeline subscribers' rates in many populous states with Lifeline programs, and instead will result only in a larger percentage of total support being generated from federal sources.

The Joint Board recommended that the FCC eliminate the current state matching requirement for Lifeline, and provide for a baseline level of federal support of \$5.25 per month that would be available to low-income consumers in all states. To maximize states' incentives to generate matching intrastate support for Lifeline, the Joint Board recommended that the FCC provide for additional federal support equal to one half of any support generated from the intrastate jurisdiction, up to a maximum of \$7.00 in federal support.

The FPSC believes the Joint Board has taken a reasonable approach to determining the baseline support amount to be provided to low-income consumers. The \$5.25 amount is a workable compromise. With matching state funding, consumers could receive a total reduction of \$10.50 to their local rates. In Florida, residential local rates range from \$6.30 to \$12.70 per month, with the majority of customers paying \$11 or less. Even when the subscriber line charge (SLC) and taxes are added, most Florida Lifeline subscribers can receive flat-rate service for a total of \$3.00 to \$10.00 per month. Measured service, which includes a certain number of calls per month, could be obtained for even less. With the additional proposed federal support, many low-income subscribers could get service for free. Even for states that do not contribute a portion of Lifeline support, we believe the proposed baseline amount of support is adequate to encourage subscribership among low-income households.

As an adjunct to the FCC's question, we note that rates appear to be only one aspect of the subscribership problem. Section 364.10(2), Florida Statutes, requires a telecommunications company serving as carrier of last resort to provide a Lifeline Assistance Plan to qualified residential subscribers, beginning July 1, 1995. BellSouth Telecommunications, Inc. (BST) inaugurated its plan in 1994. As a result, BST has a higher subscribership rate. Nevertheless, while some Florida consumers have been able to obtain service with the aid of Lifeline and Link Up, these programs have not been highly subscribed to, as shown in Table 1 below.

TABLE 1
LIFELINE ASSISTANCE PROGRAM
FLORIDA SUBSCRIBERSHIP DATA
JUNE 30, 1996

| Local Exchange Company | Number of Lifeline Residential Subscribers | Subscribers As % of Total Residential Customers |
|------------------------|--|---|
| ALLTEL | 0 | 0 |
| BST | 108,717 | 2.9% |
| Floralda | 0 | 0 |
| Frontier | 0 | 0 |
| GTEFL | 8,832 | 0.59% |
| Gulf | 0 | 0 |
| Indiantown | 5 | 0.22% |
| Northeast | 9 | 0.15% |
| Quincy | 11 | 0.12% |
| Sprint-Centel | 783 | 0.23% |
| Sprint-United | 2,056 | 0.34% |
| St. Joe | 86 | 0.38% |
| Vista-United | 0 | 0 |
| TOTAL | 120,499 | 1.9% |

The FPSC is persuaded by the low level of participation in our state that something more than reduced rates is needed to enroll eligible customers. Additionally, merely including the Lifeline program in a company's tariff does not promote subscribership. More education may be needed to make the public aware of these programs. We also agree with the Joint Board that other aspects of affordability must be considered, including voluntary toll-blocking

and reduction or elimination of deposits for Lifeline participants. We are presently exploring these types of programs for possible inclusion in our state universal service mechanism.

The FCC has expressed concern that the implementation of the Joint Board's recommendation might have no direct effect on Lifeline subscribers' rates in many populous states with existing Lifeline programs, and could instead result only in a larger percentage of the total support being generated from federal sources.

Clearly, under the proposed scheme, the federal jurisdiction would be providing a larger percentage of total support. In states such as Florida, where the increased total per customer would allow many customers to receive free or nearly free service, there would be little, if any, reason for the state fund to provide more than \$3.50. Thus, under the Joint Board's proposal, instead of funding half of the Lifeline support, the federal jurisdiction would fund two-thirds of the amount. Even if the state continued to contribute only the current \$3.50, Lifeline subscribers' rates would be directly impacted, because the customer would be receiving a benefit of \$10.50 instead of \$7.00. Since the participating state would not have to contribute more than the current \$3.50 customer amount to obtain the maximum federal benefit, we believe those states that currently participate would continue providing this amount. Under the proposed plan, if a state contributed \$1.17, the total benefit to the consumer would be \$7.00 ($\$5.25 + \$1.17 + \$0.58 = \7.00), as it is today. However, we do not believe

this would be as beneficial from a public relations standpoint, so that most states would not choose this alternative, particularly since such funding would likely come from a universal service fund, rather than general state revenues. Thus, while the federal jurisdiction would provide a greater percentage of Lifeline support than it now does, we do not foresee it carrying the entire burden with the states relinquishing their share.

However, we note that the Joint Board has suggested that states should be required to fund their share of the Lifeline amount, rather than allow companies to recover it through the ratemaking process. The question arises as to whether that would cause any states to discontinue participation in Lifeline, as a result of the necessity of establishing a funding mechanism for the program.

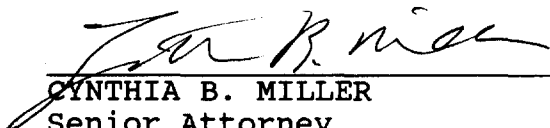
The FPSC believes that, as more states establish universal service funds in response to the new competitive paradigm, the vehicle for change in the state funding mechanism for Lifeline will be in place. We believe it will be necessary for states to provide a new means of funding, because requiring companies to fund the state's portion of Lifeline through their rates will place a burden on those companies that participate, while allowing other companies to avoid contributing their fair share. While the Joint Board proposal to make universal service support contingent upon Lifeline participation would encourage carriers to take part in the program, nevertheless, if companies are required to absorb the cost of

providing Lifeline, it would burden them and their ratepayers in a manner that does not spread the amount evenly across all players.

Assuming those states that now provide Lifeline support continue to do so, the primary benefit of the Joint Board proposal is that consumers in those states that do not participate in Lifeline would have some low-income support available, where now they have none. While we hope the matching program proposed by the Joint Board would provide sufficient incentive to non-participating states to join in, we believe that without enforced participation, which we do not recommend, some states simply may not take part.

In summary, the FPSC supports the baseline amount of funding for Lifeline, as proposed by the Joint Board. We do not believe a larger amount of funding would achieve the desired effect of increasing subscribership among low-income consumers. Instead, we agree with the Joint Board that other aspects of affordability and subscribership must be considered, including toll-blocking and reduced or zero deposits for Lifeline subscribers.

Respectfully submitted,


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DATED: December 13, 1996

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554


In the Matter of:)

Federal-State Joint Board on)
Universal Service)
_____)

CC Docket No. 96-45

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing
Comments of the Florida Public Service Commission has been
furnished by U.S. Mail to the persons on the attached list this
13th day of December, 1996.



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